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Via ECF

The Honorable Edgardo Ramos
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *In re Ex Parte Application of Eurasian Natural Resources Corporation Limited Pursuant to 28 U.S.C. § 1782 for Leave to Take Discovery for Use in Foreign Proceedings*, No. 1:20-mc-00312-ER (S.D.N.Y. 2020)

Dear Judge Ramos:

We represent Respondent HarperCollins Publishers LLC (“HarperCollins”) in the above-referenced action. We write pursuant to Your Honor’s Individual Practices to request an extension of time to file our motion to quash Petitioner Eurasian Natural Resources Corporation Limited (“ENRC[’s]”) subpoena for the following reasons:

On October 27, 2020, this Court held a pre-motion conference at which it granted HarperCollins permission to file a motion to quash a subpoena that ENRC served on it on September 19, 2020. *See* 10/27/2020 Minute Entry. The Court set a briefing schedule with the motion due on November 17, 2020; the response due on December 8, 2020; and the reply due on December 15, 2020. *See id.* The day after the pre-motion conference, HarperCollins’ counsel contacted ENRC’s counsel to inquire whether ENRC would agree to limit its subpoena, given some of the arguments raised at the conference.

Yesterday, ENRC withdrew its September 19, 2020 subpoena and served HarperCollins’ counsel with an amended subpoena, which removed certain requests and altered certain definitions and other language from the original subpoena. HarperCollins believes these amendments do not obviate the need for a motion to quash and intends to file such a motion for substantially the same reasons as set forth in its original pre-motion letter (ECF No. 16). However, to allow for sufficient time to analyze the amended subpoena and any effects it may have on the anticipated motion, HarperCollins requests a seven-day extension to file its motion to quash—rendering the motion due on November 24, 2020; the response due on December 15, 2020; and the reply due on December 22, 2020.

ENRC consents to this extension, and there have been no prior requests for extensions in this matter.

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Respectfully submitted,

/s/ Laura R. Handman